

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARD R. FURSTENAU,)	
)	
Plaintiff,)	Case No.: 07-CV-6143
)	
v.)	Judge Norgle
)	Magistrate Judge Brown
CITY OF NAPERVILLE, a municipal)	
Corporation; MICHAEL HULL, in his)	
individual and official capacity; DAVID)	JURY TRIAL DEMANDED
DIAL, in his official and individual)	
capacity; and MICHAEL CROSS, in his)	
individual and official capacity; PETER)	
BURCHARD, in his official and individual)	
capacity; MARGO ELY, in her individual)	
and official capacity, and JOE)	
MATCHETT, in his individual and official)	
capacity.)	
)	
Defendants.)	

UNOPPOSED MOTION FOR ENTRY OF A PROTECTIVE ORDER

Defendants DAVID DIAL, MICHAEL CROSS, MICHAEL HULL, MARGO ELY, and JOE MATCHETT by and through their attorneys, JAMES G. SOTOS and JOHN J. TIMBO of JAMES G. SOTOS & ASSOCIATES, LTD., PETER BURCHARD, by and through his attorneys TERRY EKL and VINCE MANCINI of EKL WILLIAMS, PLLC, and the CITY OF NAPERVILLE, by and through its attorneys TERRANCE SHEAHAN and AUDREY BRODRICK of FREEBORN & PETERS LLP, move this Honorable Court pursuant to Federal Rule of Civil Procedure 26(a) to enter a protective order (attached hereto as Exhibit A) regarding the parties' personal and confidential information. In support thereof, Defendants state as follows:

1. Plaintiff has requested that Defendants provide personnel files for various

Defendants who are current police officers for the City of Naperville. In addition, Plaintiff has requested the disclosure of confidential memoranda, as well as police records concerning Plaintiff.

2. The parties recognize that the personnel files as well as other matter deemed "Confidential" which may be sought in the course of this litigation may contain sensitive information of a non-public nature which should not be generally available to the public.

3. Defendants have conferred with Plaintiff's counsel and Plaintiff's counsel is in agreement that good cause exists for entry of the attached protective order.

WHEREFORE, Defendants respectfully request this Honorable Court grant Defendants' motion and enter the attached protective order.

Dated: March 4, 2008

s/John J. Timbo
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*One of the Attorneys for the
Defendants*

CERTIFICATE OF SERVICE

The undersigned having first been duly sworn under oath, states that he electronically filed a complete copy of the foregoing **Defendants' Unopposed Motion for Entry of a Protective Order** with the Clerk of the Court on March 4, 2008 using the CM/ECF system, which will send notification of such filing to the following counsel of record: John A. Sopuch, Aaron W. Rapier, Edward John Manzke, Shawn Michael Collins, Richard Thomas Sikes, Jr., Audrey Lane Brodrick and Terrence J. Sheahan.

s/John J. Timbo

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